

states. See Massachusetts Order ¶ 243 & n.776; Connecticut Order ¶ 76 & Apps. B, C; see also Pennsylvania Order ¶ 131. The Rhode Island PUC adopted these measurements as its own in November of this year. See Guerard/Canny/Abesamis Decl. ¶ 13.<sup>81</sup> It also ruled that it would review all changes made to Verizon's performance measurements in New York and Massachusetts, as well as any changes to performance measurements in the remainder of the former Bell Atlantic territory. See id. ¶ 20.

These standards require Verizon "to achieve excellent wholesale quality" that "go well beyond the checklist requirements," "exceed[ing them] in specificity and degree."<sup>82</sup> As the Commission has found on three separate occasions, these measurements allow regulators and competitors alike to monitor all aspects of Verizon's wholesale performance. See, e.g., New York Order ¶ 431. Verizon also is subject to the same performance standards — either retail analogs or benchmarks — in Rhode Island as in New York, Massachusetts, and Connecticut. Verizon's performance is measured against these standards in order to ensure that it provides service to CLECs in "substantially the same time and manner" as the service it provides to its own retail operations. Id. ¶¶ 44, 431.<sup>83</sup>

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<sup>81</sup> As noted above, the one modification that the Rhode Island PUC required in adopting the New York measurements was that Verizon implement two billing measurements in use in Pennsylvania that report on the timeliness of Verizon's acknowledgement and resolution of billing claims. See Pennsylvania Order ¶ 47 & nn.157-58; Guerard/Canny/Abesamis Decl. ¶¶ 13, 17, 72-73.

<sup>82</sup> Petition of New York Telephone Co. for Approval of its Statements of Generally Available Terms and Conditions, Order Adopting the Amended Performance Assurance Plan and Amended Change Control Plan at 31, Case Nos. 97-C-0271 & 00-C-0949 (NY PSC Nov. 3, 1999); Application by Bell Atlantic New York for Authorization under Section 271 of the Communications Act To Provide In-Region, InterLATA Service in the State of New York, Evaluation of the New York Public Service Commission at 3, CC Docket No. 99-295 (FCC filed Oct. 19, 1999) ("NYPSC Evaluation").

<sup>83</sup> KMPG reviewed Verizon's procedures and systems to capture and report its performance measurement results and found that they are the same as those used in Massachusetts. See Guerard/Canny/Abesamis Decl. ¶¶ 76-77; Massachusetts Order ¶¶ 44-46

Performance Assurance Plan. Verizon is subject to a self-executing Performance Assurance Plan (“Plan”) in Rhode Island that parallels the plans in effect in New York, Massachusetts, and Connecticut. Like the performance measurements used in Rhode Island, the Plan in effect in Rhode Island is substantially identical to the plans in effect in New York, Massachusetts, and Connecticut when the Commission approved Verizon’s section 271 applications in those states. The Commission has previously found that this plan provides “strong assurance that the local market will remain open after [Verizon] receives section 271 authorization.” New York Order ¶ 429; see Massachusetts Order ¶ 242; Connecticut Order ¶ 76.

Verizon’s Rhode Island Plan will place approximately \$22 million in annual remedy payments at risk. See Guerard/Canny/Abesamis Decl. ¶¶ 79-80, 85.<sup>84</sup> Like the plan that the Commission approved in Massachusetts, that amount is equal to 39 percent of Verizon’s net return in Rhode Island. See id. ¶ 80; Massachusetts Order ¶ 241 & n.769.<sup>85</sup> The Rhode Island Plan also has a nearly identical structure and allocation of remedy payments as the New York, Massachusetts, and Connecticut plans, which the Commission found are both “reasonably designed to detect and sanction poor performance when it occurs” and “reasonably self-executing.” New York Order ¶¶ 440-441; Guerard/Canny/Abesamis Decl. ¶¶ 79, 82. For all these reasons, the Rhode Island Plan, like the plan in New York, “require[s] [Verizon] to achieve

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(describing the “broad,” “persuasive” KPMG OSS test in Massachusetts). PwC also reached the same conclusion. See Guerard/Canny/Abesamis Decl. ¶ 78.

<sup>84</sup> This figure includes \$695,000 in remedy payments available to CLECs operating in Rhode Island if Verizon’s performance under the Rhode Island Change Control Assurance Plan — which is the same as those in effect in Massachusetts and New York (which also covers Connecticut) — is unsatisfactory. See Guerard/Canny/Abesamis Decl. ¶¶ 84, 116-118.

<sup>85</sup> The amount at risk in the Rhode Island Plan is thus greater than the 36 percent of net return the Commission found sufficient in approving Verizon’s application in New York and SBC’s applications in each of the five SWBT states. See New York Order ¶ 435; Texas Order ¶ 424 & n.1235; Kansas/Oklahoma Order ¶ 274 & n.837; Arkansas/Missouri Order ¶ 129 & n.409.

service quality that . . . go[es] well beyond the Checklist requirements.”<sup>86</sup> Indeed, the Plan can require Verizon to make remedy payments despite extremely good performance, whether because Verizon misses a 95-percent benchmark by 1 percentage point (thereby still providing excellent, 94-percent performance) or because a small disparity of 0.1 percentage points is found to be statistically significant. See Guerard/Canny/Abesamis Decl. ¶¶ 96, 119-121.<sup>87</sup>

Finally, Verizon has a strong business interest in providing superior wholesale service in order to encourage other carriers to use its network, see Lacouture/Ruesterholz Decl. ¶ 418; Schwartz Aff. ¶ 77, and this incentive is especially strong in a state like Rhode Island where facilities-based competition is widespread. Even aside from this business interest, however, Verizon also is subject to a host of additional safeguards and remedial measures that provide abundant protection against the possibility of anticompetitive conduct. See also Pennsylvania Order ¶ 130 (“the PAP is not the only means of ensuring that Verizon continues to provide nondiscriminatory service to competing carriers”). For example, competing carriers still have recourse to the appropriate regulatory and judicial forums to enforce their legal or contractual rights. Likewise, the Commission itself retains the ability to enforce the requirements of section 271 with penalties, up to and including possible revocation of long distance authority under section 271(d)(6)(A)(i). And it already has made clear that it will not hesitate to invoke that authority.

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<sup>86</sup> NYPSC Evaluation at 3. The Rhode Island PUC, in approving Verizon’s proposed Plan, required Verizon to make certain state-specific modifications. See Guerard/Canny/Abesamis Decl. ¶¶ 80, 83, 85, 98, 101, 105, 107; Arkansas/Missouri Order ¶ 129 (noting utility of such modifications).

<sup>87</sup> Therefore, to avoid making remedy payments, Verizon must provide service that is better than parity and that far exceeds the benchmarks.

**C. Verizon's Entry Will Increase Long Distance Competition.**

It is by now unassailable that "BOC entry into the long distance market will benefit consumers and competition." Pennsylvania Order ¶ 125; accord Massachusetts Order ¶ 234. Indeed, consumer groups have documented these benefits, concluding that consumers in New York who switched to Verizon long distance are saving up to \$284 million annually<sup>88</sup> and that Verizon's entry in New York has enabled consumers in that state to obtain rate reductions of 20 percent for local and long distance services.<sup>89</sup> One of those groups has estimated that consumers in Pennsylvania who switch to Verizon long distance will save up to \$183 million annually.<sup>90</sup> Another recent study, by MIT Professor Jerry Hausman, concludes that, in the first year after a BOC enters the long distance market, consumers in that state experience long distance savings of 10 to 20 percent.<sup>91</sup> Yet, while Verizon and other BOCs are offering customers lower rates, the long distance incumbents have raised their basic rates yet again. Consumers Action recently found that, "[s]ince last year, basic rates at AT&T and MCI-WorldCom increased during evening and weekends by up to 13 percent," and AT&T, WorldCom, and Sprint "have significantly increased charges, surcharges and fees in other areas."<sup>92</sup>

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<sup>88</sup> Telecommunications Research & Action Center (TRAC), 15 Months After 271 Relief: A Study of Telephone Competition in New York (Apr. 25, 2001).

<sup>89</sup> See Consumer Fed'n of Am. & Consumers Union, Lessons from 1996 Telecommunications Act: Deregulation Before Meaningful Competition Spells Consumer Disaster 9-10 (Feb. 2001).

<sup>90</sup> Telecommunications Research & Action Center (TRAC), Projected Residential Consumer Telephone Savings (Sept. 6, 2001).

<sup>91</sup> See Jerry A. Hausman, Effect of BOC Entry into InterLATA and IntraLATA Service in New York and Texas, at [http://www.iacompetition.org/html/full\\_hausman.html](http://www.iacompetition.org/html/full_hausman.html).

<sup>92</sup> Consumer Action, Long Distance Rates Survey 2001 (Fall 2001), at [http://www.consumer-action.org/Library/English/Newsletter/NL-I-23\\_EN/NL-I-23\\_EN.html](http://www.consumer-action.org/Library/English/Newsletter/NL-I-23_EN/NL-I-23_EN.html); see also Kalpana Srinivasan, Long-distance Giant Boosts Rate for Millions of Customers, Associated Press (June 2, 2001) ("Nearly half of AT&T's long-distance customers will see their bills go up next month, as the nation's biggest carrier raises its per-minute rates for basic

Verizon's entry will undoubtedly have the same pro-competitive effects in Rhode Island that it has in other states because Verizon will offer the same attractive long distance plans, which are simpler and less expensive than most other carriers'.<sup>93</sup> Verizon's calling plans have been particularly attractive for the low-volume customers that the long distance incumbents historically have tried to discard or ignore.<sup>94</sup> For example, not only does Verizon offer a number of plans with no monthly minimum and no calling plan fee, but it also automatically enrolls all of its customers in a calling plan (known as the Timeless plan) that has no minimum usage requirement or monthly plan fee if they fail to choose a plan. The Timeless plan is particularly attractive for low-volume users because it offers a flat, low rate of 10 cents per minute for interstate calls with no monthly calling plan fees or minimum usage fees. In contrast, the long distance incumbents require customers who do not enroll in a plan to pay relatively higher "basic" rates, or they put those customers in default plans with rates considerably higher than their most popular calling plans. And, even when the long distance incumbents do offer a flat-rate plan (i.e., with no monthly plan fee or minimum usage fee) that might otherwise be attractive to low-volume users, their rates typically are substantially higher than those offered by Verizon. For example, AT&T's cheapest flat-rate plan with no monthly fee is its "AT&T One

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plans. . . . 'Obviously we don't have a lot of competitive forces at work in the long-distance business to pressure AT&T.'") (quoting Gene Kimmelman of Consumers Union).

<sup>93</sup> Moreover, Verizon's real-world experience in New York puts to rest once and for all the claims that the long distance incumbents have rehashed for more than 15 years — based on nothing more than far-fetched theories and hyperbole — that Bell company entry into long distance would have adverse competitive effects. The Commission has already determined that such claims have no place in the review of a section 271 application. See New York Order ¶ 428; see also Texas Order ¶ 419.

<sup>94</sup> See, e.g., Low-Volume Long-Distance Users, Notice of Inquiry, 15 FCC Rcd 6298 (1999).

Rate Basic,” which, after a recent AT&T rate increase, now offers a flat-rate of 17.5 cents per minute — 75 percent more expensive than Verizon’s Timeless plan.<sup>95</sup>

Both in anticipation of and in response to Verizon’s entry into the long distance market, the incumbent long distance carriers have been forced to introduce special, lower-priced bundled services offerings to customers. For example, in New York, WorldCom rolled out a new “One Company Advantage” plan under which its customers receive unlimited local and long distance calls for 7 cents per minute, plus 200 free minutes of long distance calling.<sup>96</sup> In contrast, its flagship national plan charges nearly 14 cents per minute for in-state long distance.<sup>97</sup> Likewise, AT&T introduced its “AT&T Local One Rate New York” package, which includes reduced rates of 7 cents per minute for interstate calls and 10 cents per minute for in-state calls, and which drops the monthly fee associated with AT&T’s most comparable national plan.<sup>98</sup>

In Massachusetts and Pennsylvania, AT&T responded to Verizon’s entry by providing its customers in those states with 30 free minutes of long distance calling.<sup>99</sup> AT&T made consumers aware of this promotion through a special greeting that plays when the customer makes a long distance call.<sup>100</sup> Massachusetts and Pennsylvania were the only states in Verizon’s

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<sup>95</sup> See Srinivasan, supra note 92.

<sup>96</sup> See WorldCom, Local Choice: New York, at [http://www.mci.com/home\\_family/products\\_services/local/ny/choice.shtml](http://www.mci.com/home_family/products_services/local/ny/choice.shtml).

<sup>97</sup> See WorldCom, Local Toll and In-State Long Distance Calling for Your Home, at [http://www.mci.com/home\\_family/products\\_services/local\\_toll/index.jsp](http://www.mci.com/home_family/products_services/local_toll/index.jsp).

<sup>98</sup> See AT&T, AT&T Local One Rate New York, at [http://www.local.att.com/LocalOneRate\\_M.jhtml](http://www.local.att.com/LocalOneRate_M.jhtml).

<sup>99</sup> See AT&T Press Release, Bay State AT&T Long Distance Customers Get the Message: Thanks for Your Loyalty (May 14, 2001); see also AT&T Press Release, AT&T to Keystone State Long Distance Customers: Thanks for Your Loyalty (Aug. 14, 2001).

<sup>100</sup> See id. Moreover, AT&T extended its offer to Massachusetts despite having stated, just weeks earlier, that it had “no immediate plans to extend the program to other states.” Communications Daily at 9 (Mar. 8, 2001).

region in which AT&T has made this promotional offer available, which follows a similar promotion that AT&T made to its customers in Kansas and Oklahoma just two days before SBC was authorized to provide long distance service in those states.<sup>101</sup> AT&T has since made the same offer to its customers in Missouri and Arkansas shortly before the Commission authorized SBC to provide long distance in those states.<sup>102</sup>

As this experience makes clear, Verizon's entry not only has promoted additional local competition, but it also has produced substantial competitive benefits for long distance and bundled services packages. Consumers in Rhode Island are now entitled to the same benefits.

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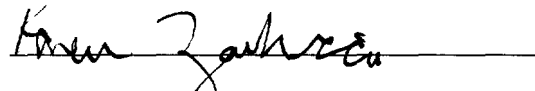
<sup>101</sup> See AT&T Press Release, AT&T Long Distance Customers in Kansas Get the Message: Thanks for Your Loyalty (Mar. 5, 2001); see also AT&T Press Release, AT&T Long Distance Customers in Oklahoma Get the Message: Thanks for Your Loyalty (Mar. 5, 2001).

<sup>102</sup> See AT&T Press Release, AT&T to Missouri Customers: Show Me the Minutes (Oct. 22, 2001); see also AT&T Press Release, AT&T Long Distance Customers in Arkansas Get the Message: Thanks for Your Loyalty (Oct. 22, 2001).

## CONCLUSION

Verizon's Application to provide interLATA service originating in Rhode Island should be granted.

Respectfully submitted,



Michael E. Glover  
Karen Zacharia  
Leslie V. Owsley  
Donna M. Epps  
Joseph DiBella  
Verizon  
1515 North Court House Road  
Suite 500  
Arlington, Virginia 22201  
(703) 351-3860

Evan T. Leo  
Scott H. Angstreich  
Kellogg, Huber, Hansen, Todd &  
Evans, P.L.L.C.  
Sumner Square.  
1615 M Street, N.W.  
Suite 400  
Washington, D.C. 20036  
(202) 326-7900

James G. Pachulski  
TechNet Law Group, P.C.  
1100 New York Avenue, N.W.  
Suite 365  
Washington, D.C. 20005  
(202) 589-0120

Bruce P. Beausejour  
Keefe B. Clemons  
Verizon New England  
185 Franklin Street  
Room 1403  
Boston, MA 02110  
(617) 743-2445





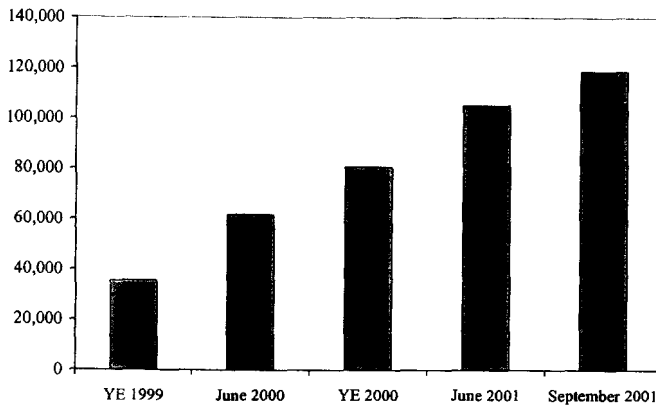
# Exhibit 1. Verizon's Checklist Compliance Under the 1996 Act

## § 271 Checklist

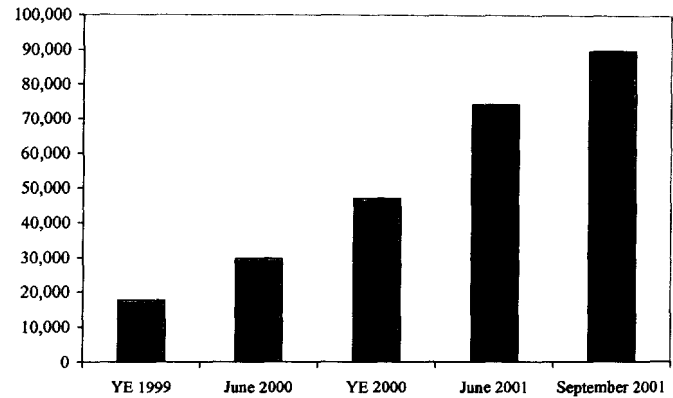
1. Interconnection	⇒	Approximately 45,000 trunks Approximately 200 collocation arrangements Approximately 90,000 facilities-based CLEC lines
2. Unbundled Network Elements	⇒	Approximately 32,000 unbundled loops Approximately 4,000 unbundled switching ports
3. Poles, Ducts, Conduits, and Rights of Way	⇒	Approximately 327,000 feet of conduit to 12 communications carriers and 7 other companies Approximately 218,000 pole attachments (including poles and conduit provided to cable operators and other utilities in addition to CLECs) to 15 CLEC/OCCs and 35 other companies
4. Local Loops	⇒	Approximately 32,000 total loops, including approximately 28,000 stand-alone loops plus 4,000 loops provided as part of platforms
5. Transport	⇒	Approximately 300 unbundled dedicated local transport facilities Approximately 4,000 shared transport facilities 35 orders for dark fiber
6. Switching	⇒	Approximately 4,000 ports using unbundled local switching
7. 911/E911/DA/Operator Services	⇒	5 CLECs purchasing OS and DA via 100 dedicated OS/DA trunks 11 CLECs purchasing 911/E911 via 65 dedicated trunks
8. White Pages	⇒	Approximately 64,000 CLEC listings (including resale)
9. Numbering Administration	⇒	Approximately 220 NXX codes
10. Databases/Signaling	⇒	2 CLECs with access to signaling network 7 CLECs using Calling Name Database 1 CLEC/IXC using Local Number Portability Database
11. Number Portability	⇒	Approximately 67,000 numbers ported via LNP
12. Dialing Parity	⇒	Local dialing parity available throughout Rhode Island
13. Reciprocal Compensation	⇒	13 CLECs, 6 CMRS providers, 6 paging carriers
14. Resale	⇒	Approximately 25,000 resold lines, including approximately 5,400 residential lines and more than 19,000 business lines

## Exhibit 2. Local Competition in Rhode Island

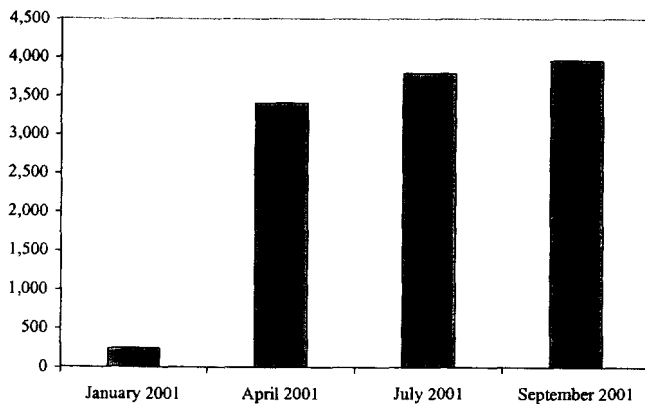
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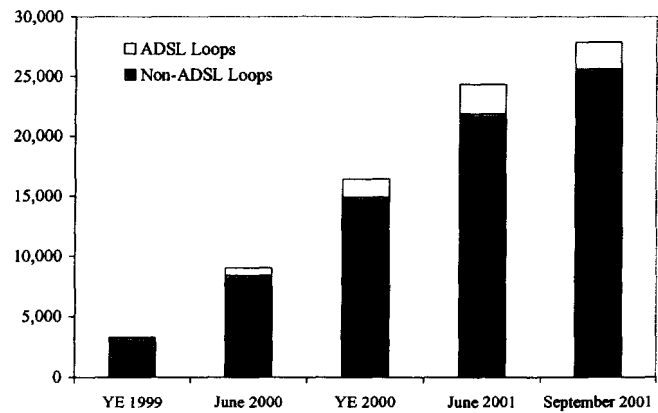
**CLEC Facilities-Based Lines (E911 Listings)**



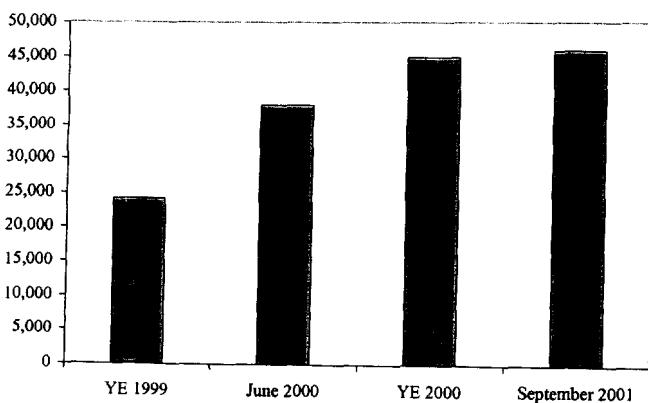
**CLEC UNE Platforms**



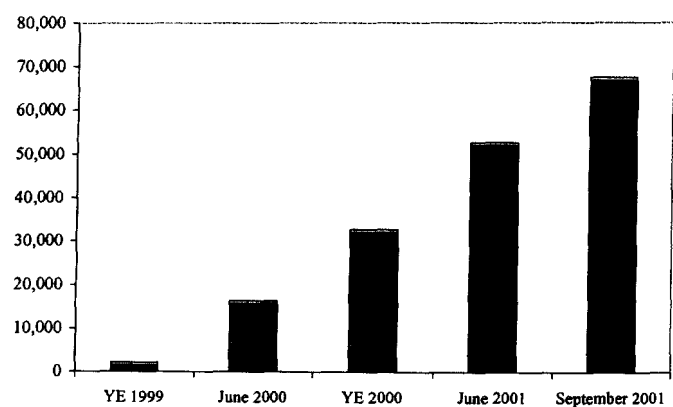
**CLEC Stand-Alone Unbundled Loops**



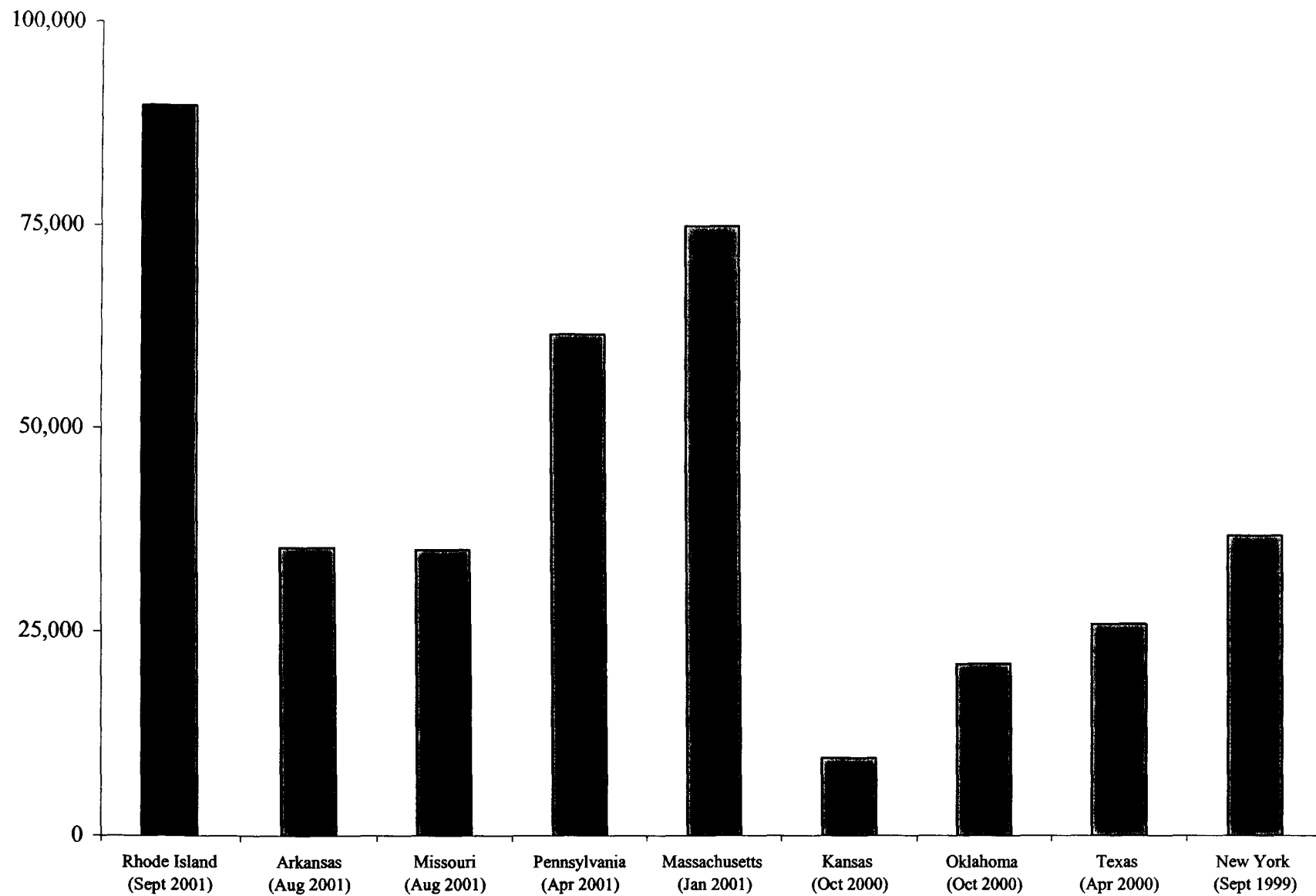
**CLEC Interconnection Trunks**



**CLEC Ported Numbers**

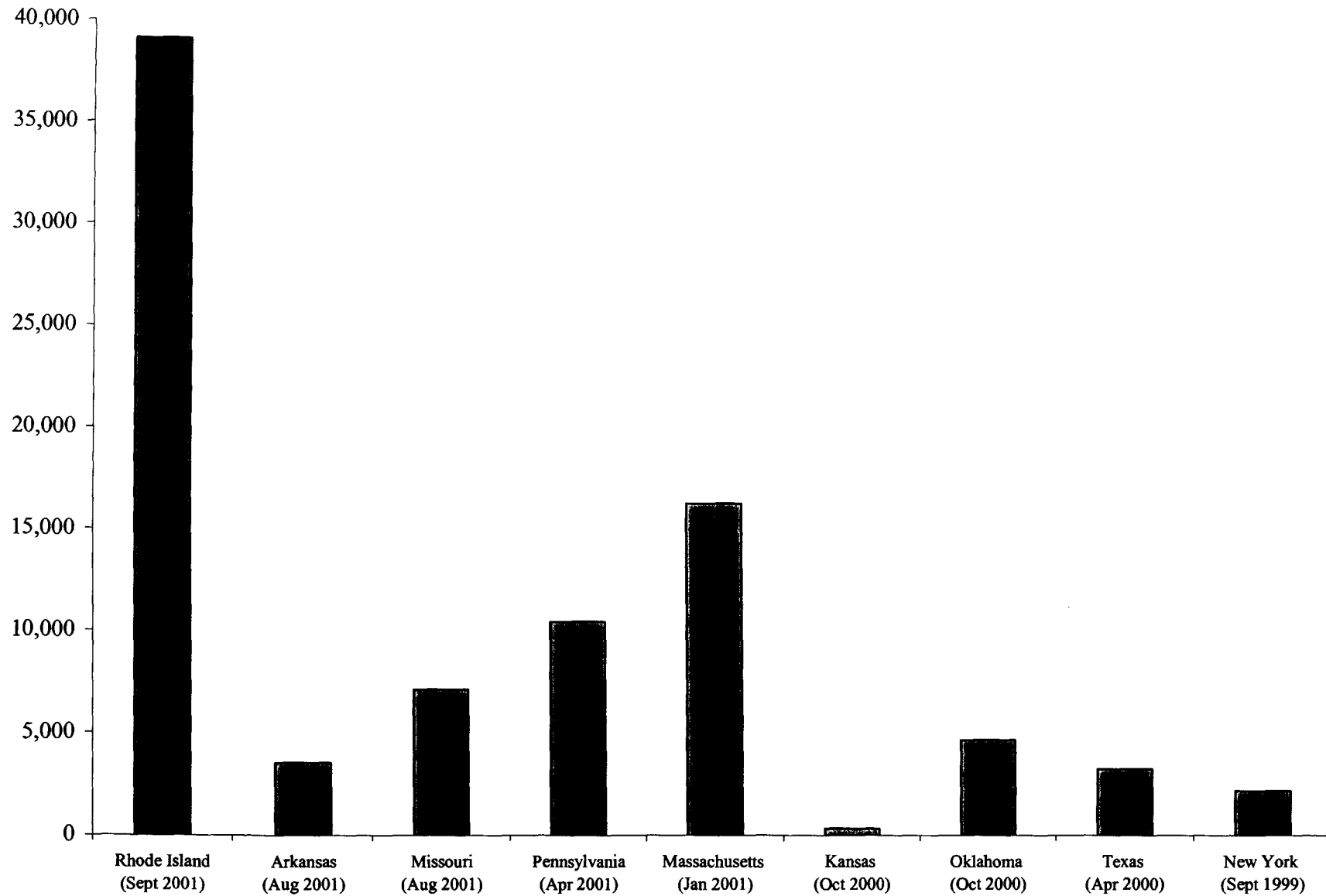


### Exhibit 3. Proportionate Facilities-Based CLEC Lines (at time of application)\*



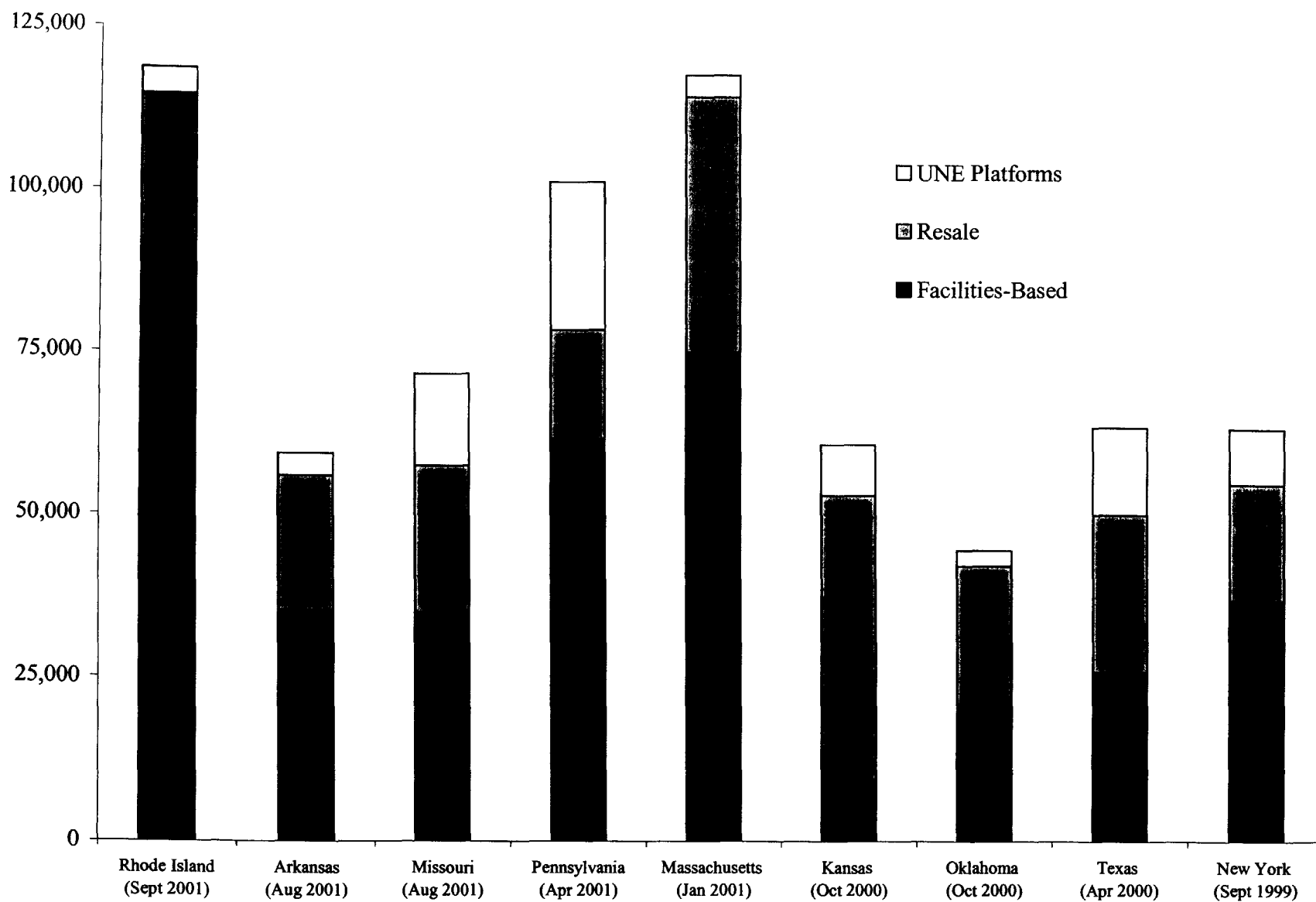
\* The number of competitive lines has been adjusted relative to the number of BOC switched access lines: VZ-RI (2001): 630,000; SWBT-AR (2001): 1.0 mil; SWBT-MO (2001): 2.6 mil; VZ-PA (2000): 6.2 mil; VZ-MA (2000): 4.3 mil; SWBT-KS (2000): 1.4 mil; SWBT-OK (2000): 1.6 mil; SWBT-TX (2000): 9.6 mil; VZ-NY (1999): 11.2 mil.

## Exhibit 4. Proportionate Residential Facilities-Based CLEC Lines (at time of application)\*



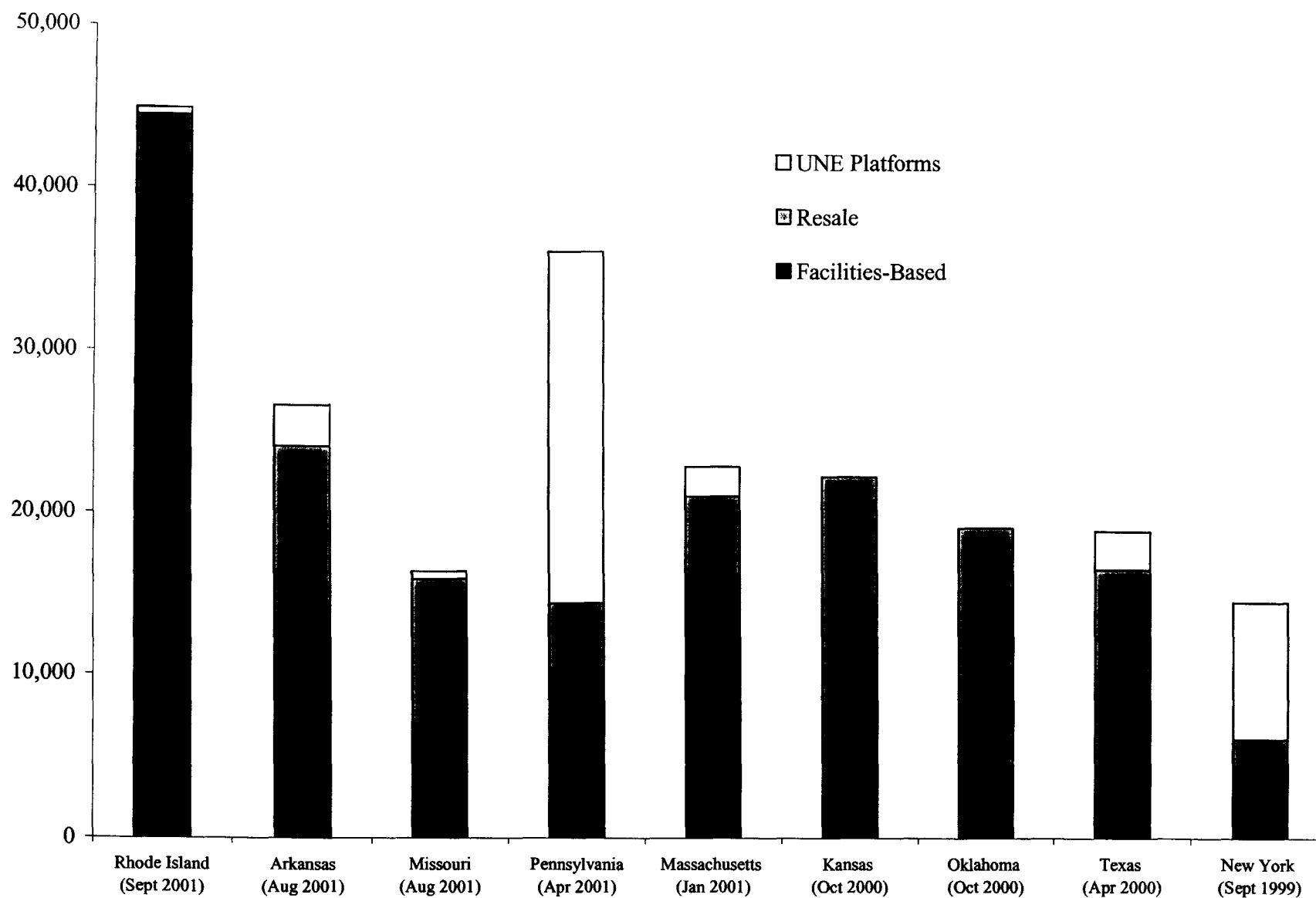
\* The number of competitive lines has been adjusted relative to the number of residential BOC switched access lines: VZ-RI (2001): 440,000; SWBT-AR (2001): 660,000; SWBT-MO (2001): 1.7 mil; VZ-PA (2000): 4.0 mil; VZ-MA (2000): 2.8 mil; SWBT-KS (2000): 950,000 mil; SWBT-OK (2000): 1.2 mil; SWBT-TX (2000): 6.3 mil; VZ-NY (1999): 7.2 mil.

## Exhibit 5. Proportionate Total CLEC Lines (at time of application)\*



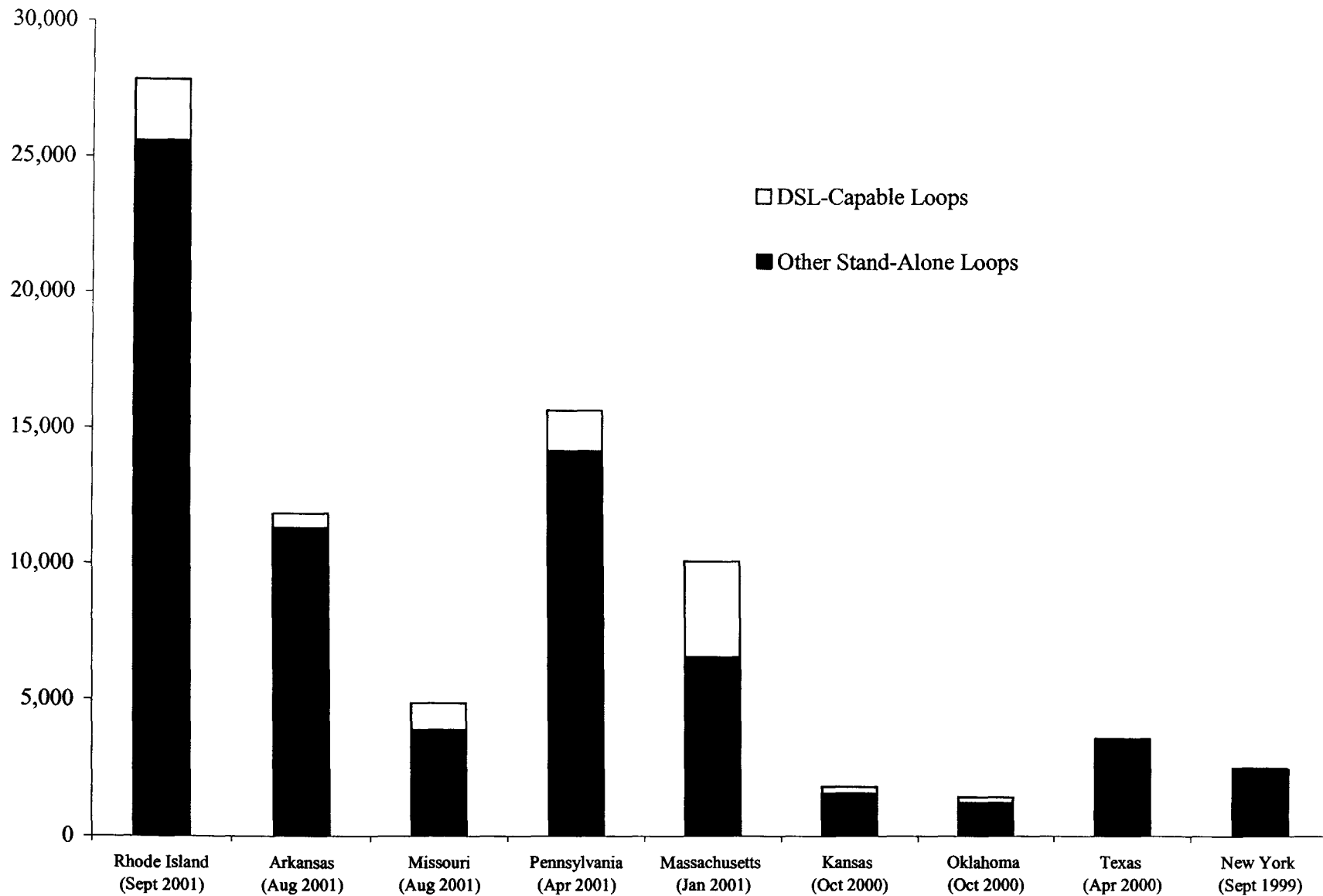
\* The number of competitive lines has been adjusted relative to the number of BOC switched access lines: VZ-RI (2001): 630,000; SWBT-AR (2001): 1.0 mil; SWBT-MO (2001): 2.6 mil; VZ-PA (2000): 6.2 mil; VZ-MA (2000): 4.3 mil; SWBT-KS (2000): 1.4 mil; SWBT-OK (2000): 1.6 mil; SWBT-TX (2000): 9.6 mil; VZ-NY (1999): 11.2 mil.

## Exhibit 6. Proportionate Residential CLEC Lines (at time of application)\*



\* The number of competitive lines has been adjusted relative to the number of residential BOC switched access lines: VZ-RI (2001): 440,000; SWBT-AR (2001): 660,000; SWBT-MO (2001): 1.7 mil; VZ-PA (2000): 4.0 mil; VZ-MA (2000): 2.8 mil; SWBT-KS (2000): 950,000 mil; SWBT-OK (2000): 1.2 mil; SWBT-TX (2000): 6.3 mil; VZ-NY (1999): 7.2 mil.

## Exhibit 7. Proportionate Stand-Alone Unbundled Loops (at time of application)\*

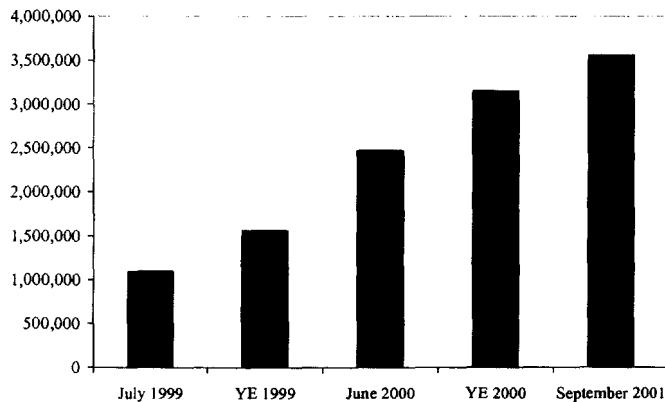


\* The number of competitive lines has been adjusted relative to the number of BOC switched access lines: VZ-RI (2001): 630,000; SWBT-AR (2001): 1.0 mil; SWBT-MO (2001): 2.6 mil; VZ-PA (2000): 6.2 mil; VZ-MA (2000): 4.3 mil; SWBT-KS (2000): 1.4 mil; SWBT-OK (2000): 1.6 mil; SWBT-TX (2000): 9.6 mil; VZ-NY (1999): 11.2 mil.

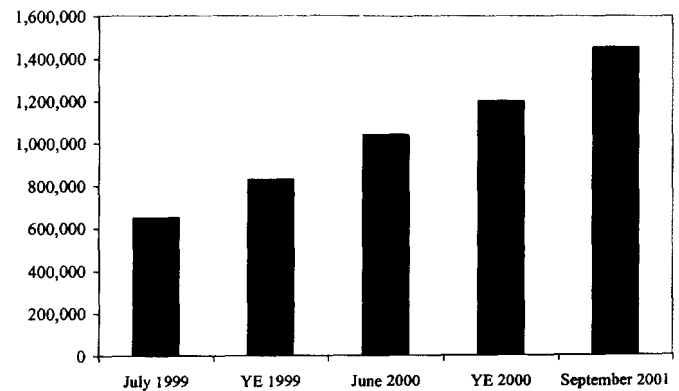


## Exhibit 8. Growth of Local Competition in New York (§ 271 Authorization Granted December 1999)

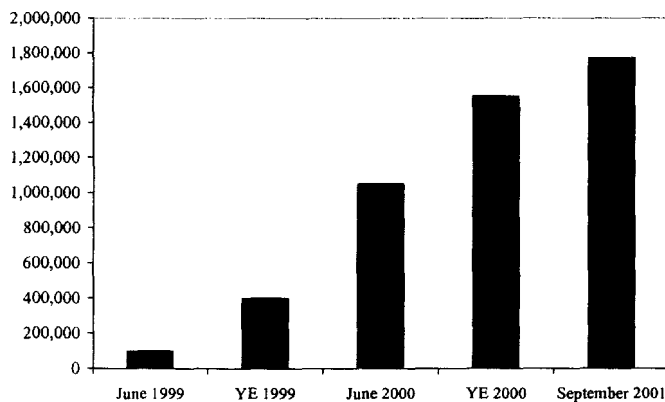
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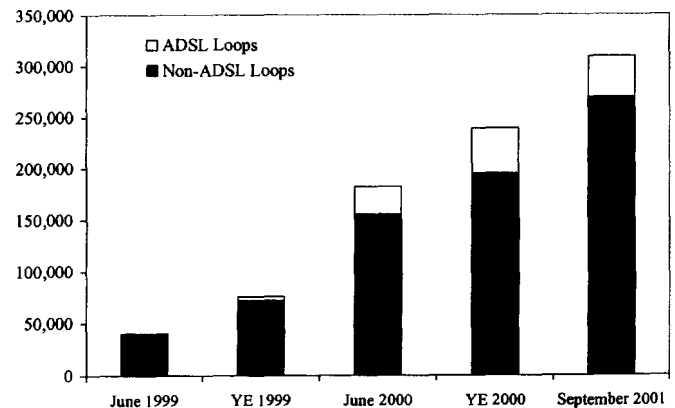
**CLEC Facilities-Based Lines (E911 Listings)**



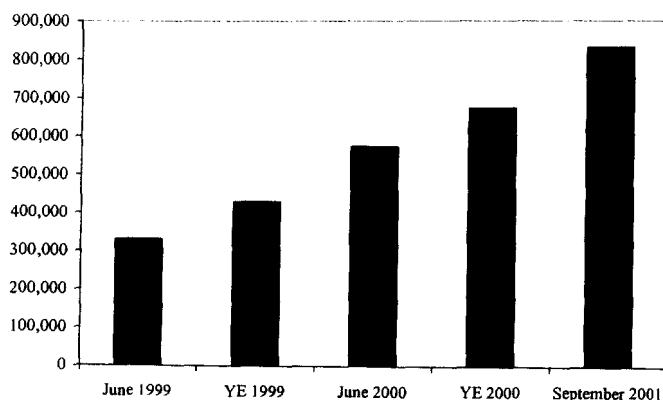
**CLEC UNE Platforms**



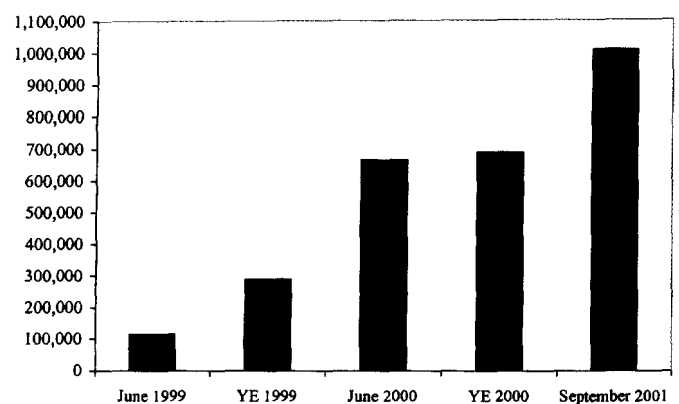
**CLEC Stand-Alone Unbundled Loops**



**CLEC Interconnection Trunks**

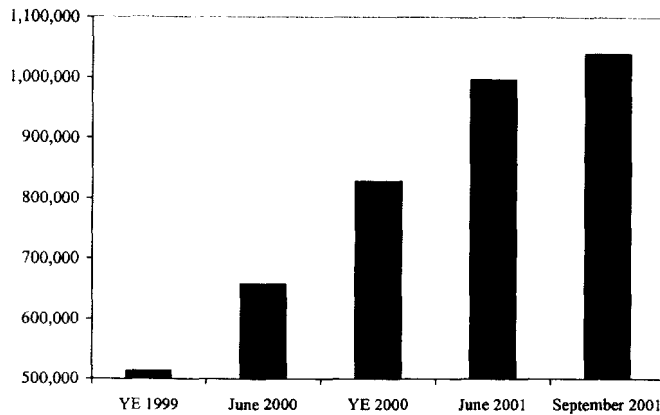


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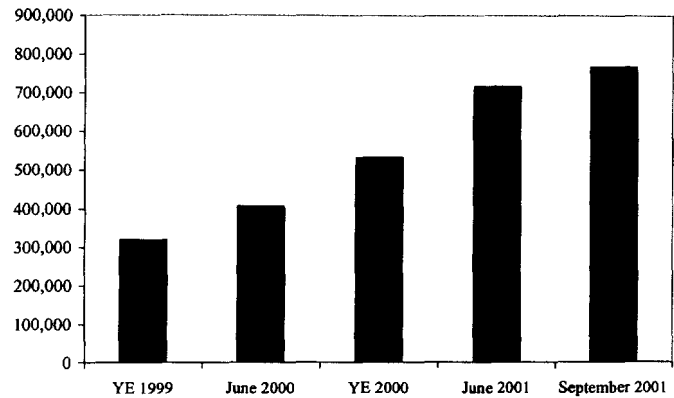


## Exhibit 9. Growth of Local Competition in Massachusetts (§ 271 Authorization Granted April 2001)

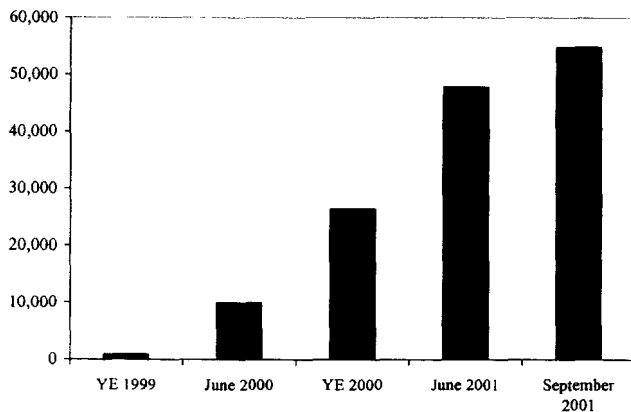
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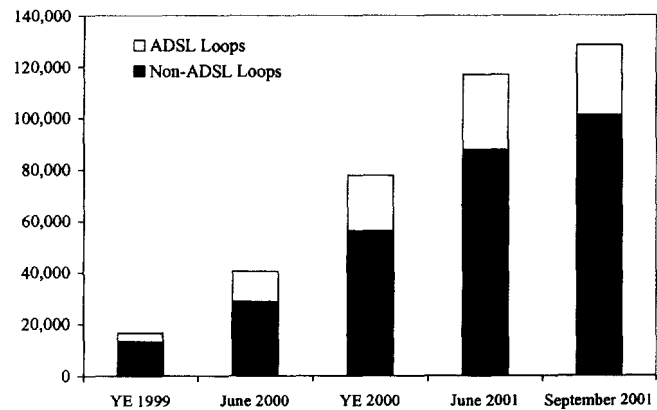
**CLEC Facilities-Based Lines (E911 Listings)**



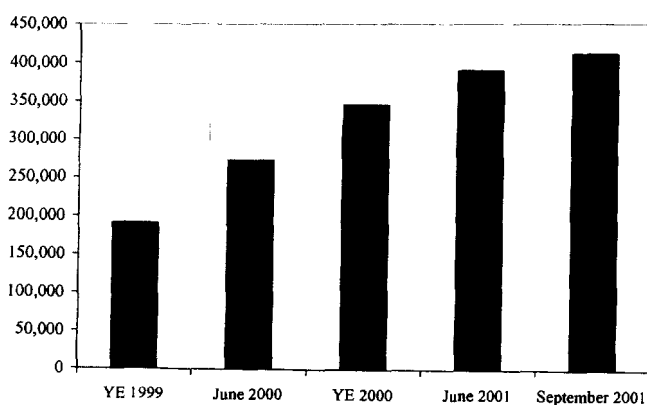
**CLEC UNE Platforms**



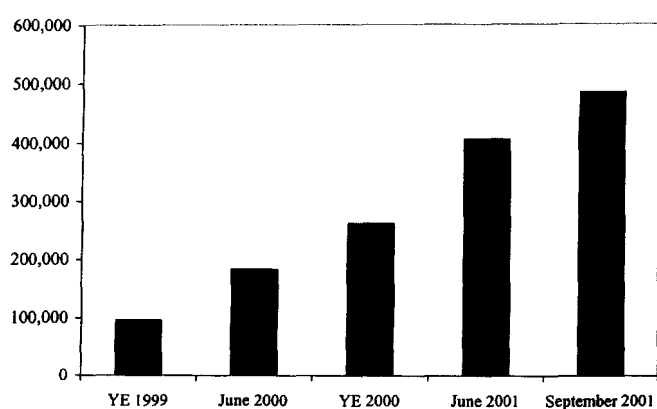
**CLEC Stand-Alone Unbundled Loops**



**CLEC Interconnection Trunks**

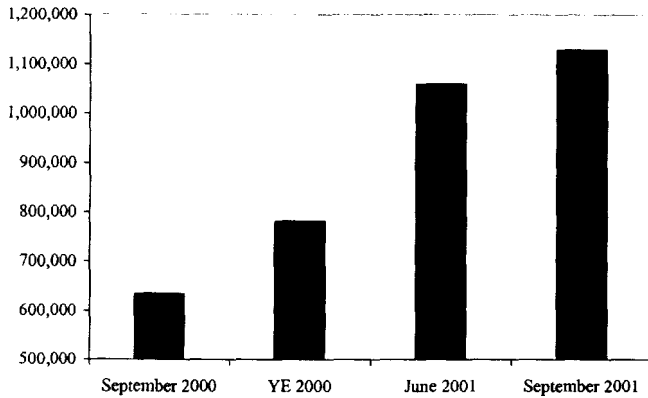


**CLEC Ported Numbers**

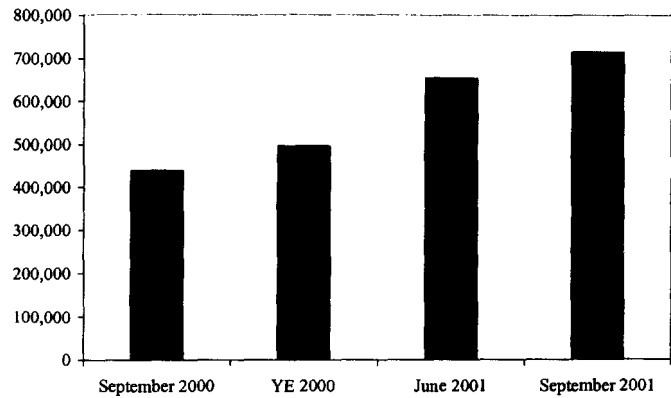


## Exhibit 10. Growth of Local Competition in Pennsylvania (§ 271 Authorization Granted September 2001)

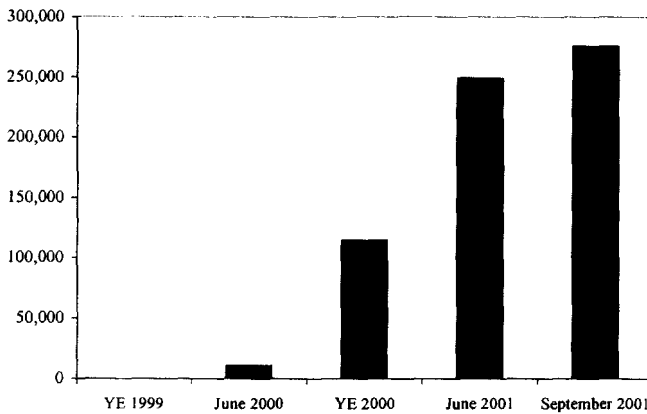
**Total CLEC Lines**



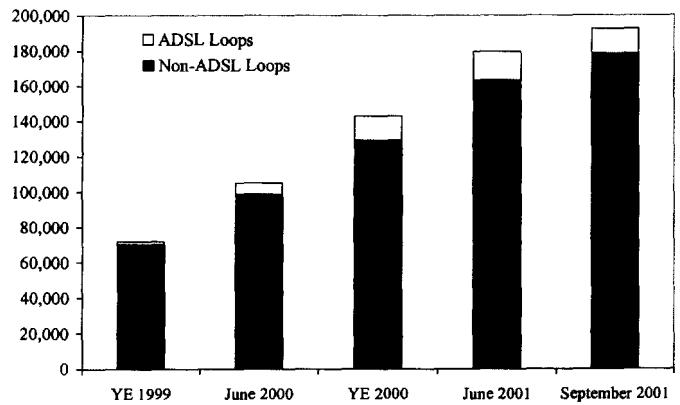
**CLEC Facilities-Based Lines (E911 Listings)**



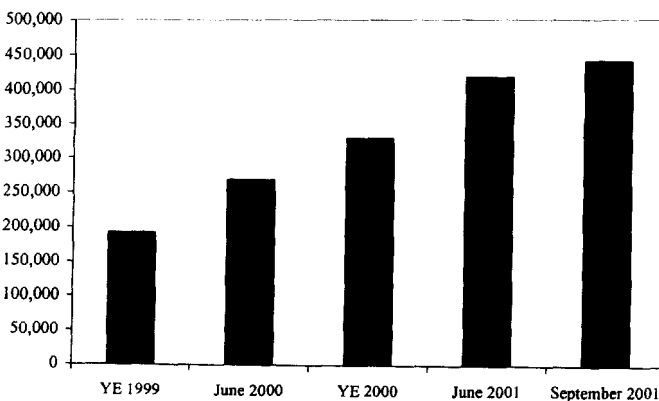
**CLEC UNE Platforms**



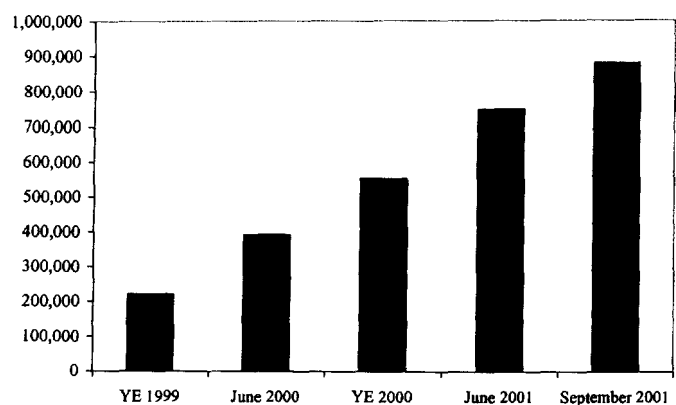
**CLEC Stand-Alone Unbundled Loops**



**CLEC Interconnection Trunks**



**CLEC Ported Numbers**





**B**

### **Required Statements**

Pursuant to the Commission's March 23, 2001 Public Notice entitled Updated Filing Requirements for Bell Operating Company Applications Under Section 271 of the Communications Act, DA 01-734 (rel. March 23, 2001), Verizon states as follows:

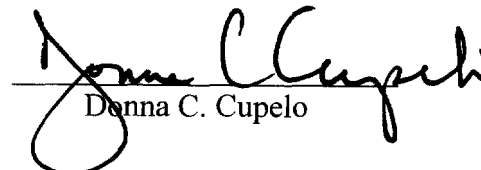
- (a) pages i-iv of this Brief contain a table of contents;
- (b) pages 1-6 of this Brief contain a concise summary of the substantive arguments presented;
- (c) pages 7-11 of this Brief contain a statement identifying how Verizon meets the requirements of section 271(c)(1), including a list of the specific agreements on which Verizon bases its application; page 7 n.12 of this Brief describes the status of federal-court challenges to the agreements pursuant to section 252(e)(6);
- (d) pages 13-14, 84-89 of this Brief contain a statement summarizing the status of the Rhode Island Public Utility Commission's proceeding examining Verizon's compliance with section 271;
- (e) this Brief contains all legal and factual arguments that the three requirements of section 271(d)(3) have been met, and is supported as necessary with selected excerpts from the supporting documentation (with appropriate citations): pages 11-73 address the requirements of section 271(d)(3)(A); pages 73-78 address the requirements of section 271(d)(3)(B); and pages 78-100 address the requirements of section 271(d)(3)(C);
- (f) pages iii-iv of and Attachment C to this Brief contain a list of all appendices (including declarations) and the location of and subjects covered by each of those appendices has been included;
- (g) inquiries relating to access (subject to the terms of any applicable protective order) to any confidential information submitted by Verizon in this application should be addressed to: Steven McPherson, Verizon, 1515 North Court House Road, Suite 500, Arlington, Virginia 22201, (703) 351-3083;
- (h) Anti-Drug Abuse Act certifications as required by 47 C.F.R. § 1.2002 are appended hereto;
- (i) certifications signed by an officer or duly authorized employee certifying that all information supplied in this application is true and accurate to the best of his or her information and belief are appended hereto.

Before the  
Federal Communications Commission  
Washington, D.C. 20554

In the Matter of )  
)  
Application by Verizon Rhode Island )  
Inc., Bell Atlantic Communications, Inc. )  
(d/b/a Verizon Long Distance), NYNEX ) CC Docket No. \_\_\_\_\_  
Long Distance Company (d/b/a Verizon )  
Enterprise Solutions), Verizon Global )  
Networks Inc., and Verizon Select )  
Services Inc. for Authorization to Provide )  
In-Region, InterLATA Services in Rhode )  
Island )

**DECLARATION AND VERIFICATION OF DONNA C. CUPELO  
AND ANTI-DRUG ABUSE ACT OF 1988 CERTIFICATION  
OF VERIZON NEW ENGLAND INC.**

1. I, Donna C. Cupelo, am Region President of Verizon for Massachusetts/Rhode Island. I am authorized to make this declaration on behalf of Verizon England Inc.
2. I have reviewed the foregoing Application by Verizon New England Inc. for Authorization To Provide In-Region, InterLATA Services in Rhode Island, and the materials filed in support thereof.
3. The information contained in the Application has been provided by persons with knowledge thereof. All information supplied in the Application is true and accurate to the best of my knowledge, information, and belief formed after reasonable inquiry.
4. I further certify that Verizon New England Inc. is not subject to a denial of federal benefits pursuant to Section 5301 of the Anti-Drug Act of 1988, 21 U.S.C. § 862.
5. I declare under penalty of perjury that the foregoing is true and correct. Executed on November 21, 2001.

  
Donna C. Cupelo

Before the  
Federal Communications Commission  
Washington, D.C. 20554

In the Matter of )  
)  
Application by Verizon New England )  
Inc., Bell Atlantic Communications, Inc. )  
(d/b/a Verizon Long Distance), NYNEX ) CC Docket No. \_\_\_\_\_  
Long Distance Company (d/b/a Verizon )  
Enterprise Solutions), Verizon Global )  
Networks Inc., and Verizon Select )  
Services Inc. for Authorization to Provide )  
In-Region, InterLATA Services in Rhode )  
Island )

**DECLARATION AND VERIFICATION OF JOHN HAVENS  
AND ANTI-DRUG ABUSE ACT OF 1988 CERTIFICATION  
OF BELL ATLANTIC COMMUNICATIONS, INC. (d/b/a VERIZON LONG  
DISTANCE)**

1. I, John Havens, am President and Chief Executive Officer of Bell Atlantic Communications, Inc. (d/b/a Verizon Long Distance). I am authorized to make this declaration on behalf of Bell Atlantic Communications, Inc.
2. I have reviewed the foregoing Application by Verizon New England Inc. for Authorization To Provide In-Region, InterLATA Services in Rhode Island, and the materials filed in support thereof.
3. The information contained in the Application has been provided by persons with knowledge thereof. All information supplied in the Application is true and accurate to the best of my knowledge, information, and belief formed after reasonable inquiry.
4. I further certify that of Bell Atlantic Communications, Inc. is not subject to a denial of federal benefits pursuant to Section 5301 of the Anti-Drug Act of 1988, 21 U.S.C. § 862.
5. I declare under penalty of perjury that the foregoing is true and correct. Executed on November 21, 2001.

  
John Havens

Before the  
Federal Communications Commission  
Washington, D.C. 20554

In the Matter of )  
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(d/b/a Verizon Long Distance), NYNEX ) CC Docket No. \_\_\_\_\_  
Long Distance Company (d/b/a Verizon )  
Enterprise Solutions), Verizon Global )  
Networks Inc., and Verizon Select )  
Services Inc. for Authorization to Provide )  
In-Region, InterLATA Services in Rhode )  
Island )

**DECLARATION AND VERIFICATION OF JOHN HAVENS  
AND ANTI-DRUG ABUSE ACT OF 1988 CERTIFICATION  
NYNEX LONG DISTANCE COMPANY (d/b/a VERIZON ENTERPRISE SOLUTIONS)**

1. I, John Havens, am President and Chief Executive Officer of NYNEX Long Distance Company (d/b/a Verizon Enterprise Solutions). I am authorized to make this declaration on behalf NYNEX Long Distance Company.
2. I have reviewed the foregoing Application by Verizon New England Inc. for Authorization To Provide In-Region, InterLATA Services in Rhode Island, and the materials filed in support thereof.
3. The information contained in the Application has been provided by persons with knowledge thereof. All information supplied in the Application is true and accurate to the best of my knowledge, information, and belief formed after reasonable inquiry.
4. I further certify that NYNEX Long Distance Company is not subject to a denial of federal benefits pursuant to Section 5301 of the Anti-Drug Act of 1988, 21 U.S.C. § 862.
5. I declare under penalty of perjury that the foregoing is true and correct. Executed on November 21, 2001.

  
John Havens

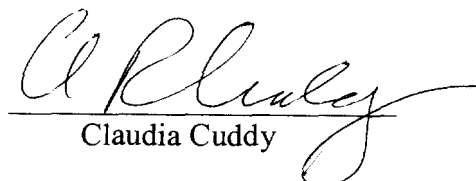


Before the  
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(d/b/a Verizon Long Distance), NYNEX ) CC Docket No. \_\_\_\_\_  
Long Distance Company (d/b/a Verizon )  
Enterprise Solutions), Verizon Global )  
Networks Inc., and Verizon Select )  
Services Inc. for Authorization to Provide )  
In-Region, InterLATA Services in Rhode )  
Island )

**DECLARATION AND VERIFICATION OF CLAUDIA CUDDY  
AND ANTI-DRUG ABUSE ACT OF 1988 CERTIFICATION  
OF VERIZON GLOBAL NETWORKS INC.**

1. I, Claudia Cuddy, am President of Verizon Global Networks Inc. I am authorized to make this declaration on behalf of Verizon Global Networks Inc.
2. I have reviewed the foregoing Application by Verizon New England Inc. for Authorization To Provide In-Region, InterLATA Services in Rhode Island, and the materials filed in support thereof.
3. The information contained in the Application has been provided by persons with knowledge thereof. All information supplied in the Application is true and accurate to the best of my knowledge, information, and belief formed after reasonable inquiry.
4. I further certify that Verizon Global Networks Inc. is not subject to a denial of federal benefits pursuant to Section 5301 of the Anti-Drug Act of 1988, 21 U.S.C. § 862.
5. I declare under penalty of perjury that the foregoing is true and correct. Executed on November 21, 2001.

  
Claudia Cuddy